

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Accelerating Wireline Broadband Deployment)	
by Removing Barriers to Infrastructure)	WC Docket No. 17-84
Investment)	

**COMMENTS OF THE MARYLAND OFFICE OF PEOPLE’S COUNSEL
ON NOTICE OF PROPOSED RULEMAKING, NOTICE OF INQUIRY, AND REQUEST
FOR COMMENT ON BROADBAND DEPLOYMENT/INFRASTRUCTURE
INVESTMENT**

Paula M. Carmody
Maryland People’s Counsel

Theresa V. Czarski
Deputy People’s Counsel

Joyce R. Lombardi
Assistant People’s Counsel

Maryland Office of People's Counsel
6 St. Paul Street, Suite 2102
Baltimore, Maryland 21202
Phone: (410) 767-8150
Joyce.lombardi@maryland.gov

June 14, 2017

The Maryland Office of People’s Counsel (“Maryland OPC”) files these comments in response to one of the questions posed by the Federal Communications Commission (“FCC”) in its April 21, 2017 Notice of Proposed Rulemaking, Notice of Inquiry and Request for Comment *In the Matter of Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment* (NPRM).¹ Maryland OPC’s Comments supplement the Comments filed concurrently in this docket by the National Association of State Utility Consumer Advocates (NASUCA) *et al.*, of which Maryland OPC is a signatory. Maryland OPC writes separately only with regard to the Copper Retirement portion, Part II.B.1 of the NPRM “Expediting the Copper Retirement and Network Change Notification Process” (¶¶ 53-62). These comments describe the real world experience in Maryland with the copper retirement notice process required under the existing FCC rules, and demonstrate that the NPRM proposals to substantially eliminate these notice requirements will harm consumers.

Maryland OPC is an independent state government agency with a statutory duty to represent the concerns of Maryland’s residential telecommunications customers.² Verizon Maryland is the predominant regulated telephone company, the incumbent local exchange carrier (ILEC). Verizon Maryland provides basic local service through a copper network. In approximately half of the state, Verizon also has deployed a fiber network. The Maryland Public Service Commission (PSC) retains regulatory authority over Verizon’s provision of basic landline

¹ WC Docket No. 17-84, Notice of Proposed Rulemaking, Notice of Inquiry, and Request for Comment, released April 21, 2017 (“NPRM” or “17-84 NPRM”).

² Maryland Code Ann., Public Utilities Article (PUA) §2-204.

service.³ Recent research from the AARP show that most older Marylanders rely on landline service, even if they have wireless service, and favor continued regulation of that service.⁴

The NPRM proposes “eliminating the requirement that incumbent LECs provide direct notice of planned copper retirements to retail customers.” (§ 61) The NPRM alleges that there is “little evidence of consumer confusion” either before or after the rule changes. Based upon our Maryland experience, Maryland OPC disagrees. Verizon’s deployment of its fiber network in Maryland, which took place from about 2007 to 2010, has not been without customer confusion. In 2007, OPC asked the Maryland Public Service Commission (PSC) to investigate (among other things) customer complaints about Verizon’s misleading and confusing marketing of its fiber and FiOS services.⁵ Verizon agreed to modify its communications to customers.⁶ Meanwhile, the Maryland PSC continued to investigate and rule on Verizon’s service quality obligations.⁷

Verizon’s transition from copper to fiber in Maryland seemed to shift and intensify following the publication of the FCC’s Copper Transition Order in August 2015.⁸ In September

³ Maryland Code Ann., Public Utilities Article (PUA) §4-301.

⁴ AARP ‘s 2017 Maryland Survey of Voters Age 45-Plus, released in early 2017, show that 98 percent of registered Maryland voters age 45-plus still use traditional land lines even though 89% use wireless service or have a bundled service plan and 63% support government oversight of traditional landline providers. <http://www.aarp.org/research/topics/economics/info-2017/2017-md-survey-voters-telephone-cellular.html>.

⁵ See, generally, the docket under Case No. 9123, *In the Matter of Commission’s Inquiry into Verizon Maryland Inc.’s Provision of Local Exchange Telephone Service Over Fiber Optic Facilities* as initiated by Office of People’s Counsel’s Request for an Investigation (Mail Log 107092), August 9, 2007.

⁶ See Order 83137, at p. 9, Case Nos. 9072, 9114, 9120, 9121, 9123, 9133, *In Re Verizon Maryland Inc.*, 279 P.U.R.4th 504 (February 2, 2010) Mail Log 121510.

⁷ *Id.*

⁸ *In the Matter of Technology Transitions Policies and Rules Governing Retirement Of Copper Loops by Incumbent Local Exchange Carriers, Special Access for Price Cap Local Exchange Carriers AT&T Corporation, Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, GN Docket No. 13-5; RM-

2016, numerous Maryland consumers alerted Maryland OPC to the fact that Verizon had begun sending notices of copper retirement pursuant to FCC Rule 51.332. According to Verizon's *Public Notice of Copper Retirement* filed with the FCC on September 15, 2016, the copper retirement notices were sent to thousands of households in five different wire center areas located in Bethesda, Columbia, Glen Burnie, Rockville and Towson, Maryland.⁹ Though Verizon's initial notices listed an eventual copper retirement date of September 15, 2017. Maryland OPC also learned that Verizon was sending additional notices just a few weeks later. These notices alerted many of the same customers to an imminent – and mandatory—copper retirement date of December 14, 2016. Numerous customers called Maryland OPC and complained to the Maryland PSC. Many customers were confused and upset by the timing and inconsistency of the notices. For example, one Maryland customer complained to the Maryland PSC that:

Verizon has decided to retire copper land lines in my area. They sent me a letter saying this would be done by September, 2017. Although I was unhappy about this, because I would like to keep my phone service as it is, at least it gave me some time to research what my other options were. Then I got a second letter saying I only had until December 14, 2016 to decide. This is not enough time, considering Halloween, Thanksgiving and Christmas are so close. I must also switch my DSL Internet to something else by Dec. 14th. I do most of my Christmas shopping online and would prefer to wait until after the holidays to do all of this switching.¹⁰

11358; WC Docket No. 05-25; and RM-10593, Tech Order (Rel. August 7, 2015) (“*Copper Transition Order*”)

⁹*Public Notice of Copper Retirement Under Rule 51.332, Copper Retirement ID No. 2016-03-1A-MD* filed with the Federal Communications Commission (FCC) on September 15, 2016

¹⁰ Complaint to the Office of External Relations, Maryland PSC, PIA Response No. 21; Complaint No. 1016325250, filed 10/24/16 (customer information redacted), Exhibit 1

Many of the callers were senior citizens, who had numerous questions about battery back-up, power outages and compatibility with home alarm systems and medical alert devices. Even though they had received Verizon's mailings and even talked to Verizon agents on the phone, almost none of them understood the difference between Verizon's regulated fiber voice service and its unregulated FiOS voice products. For example, as one customer complained to the Maryland PSC:

Verizon is threatening to stop my landline phone and internet services...if I do not sign up and have FiOS installed by that date. This should be illegal..I'm 78 years old with a heart condition, I need my telephone in emergencies; my wife is 75 with respritory (sic) issues too...I have been avoiding FiOS for 6 years now."¹¹

Upon review of both sets of letters, Maryland OPC concluded that the timing and substance of the retirement notices violated 47 USC §51.332 – the very rule that the NPRM 17-84 seeks to repeal.¹² On October 28, 2016, Maryland OPC filed a petition with both the FCC and Maryland PSC asking for a suspension and investigation of Verizon's copper retirement notices.¹³ The federal rules provided the framework for both petitions, since the Maryland PSC

¹¹ Complaint to the Office of External Relations, Maryland PSC, PIA No. 17; Complaint No. 1116325786, filed 11/03/16, attached as Exhibit 2

¹² OPC alleged that Verizon's letters violated the 90-day timing provisions of the rule and also that the substance of the letters was non-compliant with 47 C.F.R. Section § 51.332(c)(2). OPC noted that the letters, among other things, provided misleading information on the need for back-up power and did not adequately distinguish FiOS from regulated fiber voice.

¹³ Petition of Office of People's Counsel for an Investigation Into the Copper Retirement Notices Sent By Verizon, Maryland LLC (filed 10/28/16 with Maryland Public Service Commission, Mail Log No. 202479) ; Opposition Comments of the Maryland Office of People's Counsel to the Copper Retirement Notices Sent by Verizon Maryland, LLC to Maryland Retail Customers Under Rule 51.332 and Request for Immediate Suspension of Those Notices Pending an Investigation, filed 10/28/16 with the FCC, Docket No. WC-16-351. The FCC did not respond to OPC Maryland's petition.

has long recognized that the FCC made clear there was still a role for state oversight of copper retirement issues.¹⁴

The Technical Staff of the Maryland PSC responded to Maryland OPC's petition. Verizon Maryland offered to the Maryland PSC that it suspend its copper retirement notices for 60 days and work with Technical Staff and Maryland OPC to modify the timing and substance of its consumer retirement notices. This process worked to the satisfaction of the parties. The resolution was reflected in a report submitted to the Maryland PSC on February 1, 2017.¹⁵ Verizon resumed its network transformation process, using the modified letters and FAQs.

Anecdotally, OPC received far fewer citizen complaints once the process resumed and the new notices were sent to Verizon customers. For those calls that did come in, OPC was better able to explain the entire process of network transformation. OPC, Staff and Verizon also established a work group to help resolve any new conflicts or issues that arose. As later observed by Maryland Public Service Commission Staff: "Staff has worked closely with Verizon and OPC to ensure that customers are receiving appropriate notice on network transformation."¹⁶

In Maryland's case, the copper retirement process is arguably going much smoother for consumers and agencies, as well as Verizon, now that all parties are working together, with the

¹⁴ In 2010, the Maryland PSC stated that "To the extent [that] Maryland ... customers might not, at some point, be adequately protected by the FCC's rules, Verizon concedes that we may adopt copper retirement regulations of our own that are consistent with federal law." Case Nos. 9072 et al, Order No. 83137 at p. 60; See also Copper Transition Order, at, e.g. ¶ 96, FN 347("citing 29 FCC Rcd at 14994, para. 54; Triennial Review Order, 18 FCC Rcd at 17148, para. 284 ("[W]e stress that we are not preempting the ability of any state commission to evaluate an incumbent LEC's retirement of its copper loops to ensure such retirement complies with any applicable state legal or regulatory requirements."))

¹⁵ Report attached as Exhibit 3.

¹⁶ Comments of the Staff of the Maryland Public Service Commission, filed June 1, 2017 (ML # 215507), at 29.

same materials and stated goals. Rule 51.322 was not a hindrance to this process: it was the very framework on which the most recent wave of large-scale copper retirement in Maryland was built.

Maryland OPC also believes that Maryland's recent experience under the current FCC copper retirement notice rules is particularly relevant to the query in the NPRM 17-84 at ¶ 61 on "the likely impacts of eliminating such notice to consumers who have disabilities and senior citizens." The FCC rules established a reasonable framework for customer notice of the planned copper retirement. The initial non-compliant notices produced confusion and frustration among customers. However, the revised compliant notices and extra time have reduced the level of misunderstanding and hardship, particularly for senior citizens and customers who had to ensure compatibility with medical devices. Verizon's subsequent willingness to work with Maryland OPC and these customers was helpful to this process. However, none of this would have occurred without the FCC's current notice regulations and the ability of an agency like Maryland OPC to bring customer service problems to the attention of the Maryland PSC for resolution.

In sum, Maryland OPC urges the FCC to recognize the value and importance of the current copper retirement rules for consumers in place. These rules benefit consumers – but they also assist Verizon with a smoother IP transition in those areas of the State with a fiber network as well as other unregulated services.

Respectfully submitted,

Paula M. Carmody
Maryland People's Counsel

Theresa V. Czarski
Deputy People's Counsel

/electronic signature/

Joyce R. Lombardi
Assistant People's Counsel

Maryland Office of People's Counsel
6 St. Paul Street, Suite 2102
Baltimore, Maryland 21202
Phone: (410) 767-8150
Joyce.lombardi@maryland.gov

Dated: June 14, 2017

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 14th day of June, 2017, the foregoing “Comments of the Maryland Office of People’s Counsel On Notice Of Proposed Rulemaking, Notice Of Inquiry, And Request For Comment On Broadband Deployment/Infrastructure Investment” was served, pursuant to 47 C.F.R. § 1.47, by email and/or U.S. postal service, postage prepaid, to the following:

Frederick E. Moacdieh
Executive Director
Federal Regulatory and Legal Affairs
1300 I Street NW, Suite 400 West
Washington, D.C., 20005
Frederick.moacdieh@verizon.com

Janet Gazlay Martin
Director
Network Transformation
Verizon
230 West 36th Street, Room 802
New York NY 10018

Suzan D. Paiva
Assistant General Counsel
Verizon
1717 Arch Street, 3 East
Philadelphia PA 19103
Suzan D.Pavia@verizon.com

David J. Collins, Executive Secretary
Maryland Public Service Commission
6 St. Paul Street, 16th Floor
Baltimore MD 21202

Respectfully submitted,

/electronic signature/

Joyce R. Lombardi
Assistant People’s Counsel
Maryland Office of People’s Counsel
(410) 767-8150

20

Complaint#: 1016325341
Date Filed: 10/25/2016
Date Closed: 10/28/2016

7717 - Provision of telephone service (copper v. fiber)

Basis of Complaint:

On Sept 15, 2016 I was sent a letter stating Verizon was retiring the copper wires on or about September 15, 2017 and over the next few months they would be contacting me to switch to fiber. Two weeks later, Sept 29, 2016 I was sent another letter stating that I had to schedule an appointment by December 14, 2016 to allow them to come to my house to switch to fiber or if I did not they would suspend my services on or after Dec 14, 2016 and I would only be able to call them or 911. I pay my bills on time and this is not 90 days notice so how can they threaten to turn off my service? I would be happy to provide you copies of these letters and now they are calling on the phone and telling me if I don't pick a date they will cut off my service. I feel like I am being strong armed by the utility to make a change I don't want. We lose power too often and too long to be dependent on battery back up. Please contact me by cell [REDACTED] to discuss further, Thank you

UAS's Final Comments:

ltrs #6 & 63; contacted cust; provided details of migration; cust not satisfied

21

Complaint#: 1016325250
Date Filed: 10/24/2016
Date Closed: 10/27/2016

7717 - Provision of telephone service (copper v. fiber)

Basis of Complaint:

To whom it may concern,

Verizon has decided to retire copper land lines in my area. They sent me a letter saying, this would be done by Sept. 2017. Although I was very unhappy about this, because I would like to keep my phone service as it is, at least it gave me some time to research what my other options were.

Then I got a second letter saying I only had until Dec. 14, 2016 to decide. This is not enough time, considering Halloween, Thanksgiving and Christmas are so close. I must also switch my DSL internet to something else by Dec. 14th. I do most of my Christmas shopping online and would prefer to wait until after the holidays to do all of this switching.

I'm also a little confused on why they gave me options for switching my DSL to something else but only tell me it may be more or less costly.

UAS's Final Comments:

ltr #6; to migrate to fiber before end of yr; has contact info

16

Complaint#: 1216326763**Date Filed:** 12/01/2016**Date Closed:** 01/17/2017

7714 - Bundled billing disputes

7717 - Provision of telephone service (copper v. fiber)

Basis of Complaint:

Trying to get only voice service but company only allows bundle service for the area since Fios installed.

UAS's Final Comments:

Ltr #6; svc installed 1/6/17; confirmed working

17

Complaint#: 1116325786**Date Filed:** 11/03/2016**Date Closed:** 12/07/2016

7717 - Provision of telephone service (copper v. fiber)

Basis of Complaint:

Verizon is threatening to stop my landline phone and internet services on 11/17/2017 if I do not sign up and have FiOS installed by that date. This should be illegal. I pay more for copper wire connection and am all right with that. I'm 78 years old with a heart condition, I need my telephone in emergencies; my wife is 75 with respiratory issues also. It seems to me it should not be possible for a company to force customers to allow service people to come into their homes to change technologies if the change is not wanted. I have been avoiding FiOS for at least 6 years now. They know I don't want it. please do something. They should make the changeover at the pole, not inside my walls if they want to have a fibre optics mainline instead of copper. No fuss, no mess, no service call, and they plug their box into BGE at their expense, not mine!

UAS's Final Comments:

Mld Ltr 5. Verizon reported customer is part of its Network Transformation's Wave 2 for its Towson, Maryland Wire Center using schedule migrations to avoid "flash cut". Copper facilities retirement date set for on or after September 17, 2016.

Suzan DeBusk Paiva
Assistant General Counsel



1717 Arch Street, 3 East
Philadelphia, PA 19103

Tel: (215) 466-4755
Fax: (215) 563-2658
Suzan.D.Paiva@Verizon.com

February 1, 2017

E-File and Federal Express

Mr. David J. Collins
Executive Secretary
Public Service Commission of Maryland
6 St. Paul Street, 16th Floor
William Donald Schaeffer Tower
Baltimore, Maryland 21202

**Re: Petition of the Office of People's Counsel for Investigation and Suspension of
Copper Retirement Notices (ML # 202479)**

Dear Mr. Collins:

As directed by Letter Order dated December 14, 2016, Verizon Maryland LLC ("Verizon") provides the following report addressing the resolution of the issues raised by the Staff of the Public Service Commission of Maryland ("Staff") and the Office of People's Counsel ("OPC") relating to Verizon's copper retirement and fiber migration notices.

Verizon, Staff and OPC met on December 20, 2016, followed by various follow-up conversations, conference calls, and emails. Verizon, Staff, and Office of People's Counsel (OPC) have developed this report as a work group and the parties agree on its contents.

A. The Network Transformation Process

Verizon explained that, although its network transformation program is new to Maryland, Verizon has been migrating customers to fiber facilities and retiring copper in other states for several years. To date, Verizon has migrated over 100,000 customers throughout its footprint.¹ In all of these instances, customers may continue to retain their existing voice service at the same

¹ Network transformation has been ongoing in Massachusetts, Rhode Island, New York, New Jersey, Pennsylvania, Delaware, and Virginia.

rates, terms, and conditions, using state of the art fiber facilities instead of copper. Customers are not, as a matter of policy, forced to change to a Voice over Internet Protocol-based service, nor are they charged for the migration of their services.² In addition, during Verizon's network transformation process, Verizon works closely with Public Service Answering Points (PSAPs) and is committed to ensuring that there is no interruption of service to the PSAPs' ability to perform emergency services.

Verizon filed its FCC notice of copper retirement with the FCC on September 15, 2016 for the Bethesda, Columbia, Glen Burnie, Rockville and Towson wire centers in Maryland. Customer communications followed the same process Verizon had used in the other states. The general process for residential customers is as follows:

1. **FCC Notice:** The FCC held that a party wishing to retire copper need not file for approval, but must instead follow a notification process.³ A telephone provider, like Verizon, begins the process by filing with the FCC a public notice of copper retirement under 47 C.F.R. § 51.332(b)(1). That notice will give a date on or after which that party intends to retire copper. On the same date as filing with the FCC, the party must also send notice to interconnecting entities, state utilities, state governors, tribal entities, the Department of Defense, and non-residential customers. The filing party must also send notice to residential customers. See 47 C.F.R. § 51.332(e). The FCC rules provide that residential customers must receive notice at least 90 days before their copper service is retired. Customers may opt to switch services or providers before the 90 days. In this case, Verizon sent the initial notice (Letter 0) to residential customers on the same day it filed with the FCC and sent other parties a copy of the FCC filing. A provider may also send separate communications discussing a particular customer's planned migration of his or her services. If a company gives notice as provided by the rules, the copper retirement is deemed approved 180 days after the FCC releases public notice of the filing. The FCC has not yet released its public notice of filing in this case.
2. **Customer Waves:** On the date it files with the FCC, Verizon sends its initial copper retirement notice (Letter 0) to a large group of customers – all of those served by the copper facilities to be retired. For example, when Verizon plans to retire all copper facilities served by a wire center switch, it sends the initial copper retirement notice (Letter 0) to all customers served by those copper facilities. Verizon then divides the group into smaller sub-groups ("waves") for subsequent communications and migrations. Dividing the large group into waves allows Verizon to allocate resources efficiently and have sufficient staff to provide prompt appointments and respond quickly to affected customers. The first "wave" or sub-group receives "Letter 1"

² Voice over Internet Protocol or "VoIP" services are defined at Md. Public Utilities Code Ann. § 8-601 and exempt from this Commission's jurisdiction under Md. Public Utilities Code Ann. § 8-602. While various providers offer VoIP services, Verizon's VoIP service is marketed under the name "Fios Digital Voice."

³ Copper retirement in this context means "the removal or disabling of copper loops, subloops or the feeder portion of such loops or subloops; or the replacement of such loops with fiber-to-the-home loops or fiber-to-the-curb loops." 47 C.F.R. § 51.332(a).

shortly after the copper retirement notice; later waves receive Letter 1 on subsequent dates in phases.

3. ***Customer Communications:*** Following the initial notice of copper retirement (Letter 0), Verizon provides each wave of customers with additional communications, starting with Letter 1. The first wave to receive such communications is likely to receive Letter 1 soon after the FCC filing, and subsequent waves will proceed as discussed above. These communications are timed against when that specific wave needs to move to fiber so that the entire migration is complete before the date for full copper retirement as specified in the original notice. Residential customers must have at least the FCC mandated 90-day time period following the initial notice before they are required to migrate to fiber phone services or face suspension of their regulated phone line services. Each wave of customers receives the following communications:

- Letter 1 - asks the customer to make an appointment by a specific date and informs that failure to contact Verizon by that date will result in suspension of service. The specific suspension date is at least 90 days from the initial notice of copper retirement (Letter 0) that the customer previously received.
- Automatic Network Announcements (“ANAs”) – two automated calls reminding customer to make appointment.
- Outbound phone calls from live representatives.
- Postcard – short colorful, attention-grabbing card reminding customer to take action to avoid suspension of service.

As soon as a customer takes action (e.g., calls to place an order, or ports or disconnects service), Verizon stops contacting the customer and as long as a customer calls Verizon to place an order, Verizon will offer flexibility on the date to schedule the appointment. For example, if the customer needs more time to make a decision, is travelling, or cannot be available for a technician visit, Verizon can schedule an appointment at a date that is later than the suspension date specified in the communications. Verizon will work with the customer on a case by case basis to establish a mutually agreed upon date. If the customer does not call to schedule an appointment, service is suspended. Suspension of service is discussed in more detail below. The suspended customer retains a “soft dial tone” and can still place calls to 911 and to the Verizon business office, which is explained in Verizon’s communications. See Exhibit A for a generic schedule of all communications.

4. ***Special Process for Mature Customers:*** Experience in other states has shown that customers 65 and older may be more likely to experience confusion and/or register complaints about the process than other customers. To address this issue, Verizon has developed a special communication process for those mature customers we are aware of. These customers receive a special letter that advises the customer that an expert Verizon representative will call the customer to explain the process and make the necessary arrangements to migrate the customer’s service to fiber facilities.

Verizon has found that these contacts are more likely to result in the customer migrating or making alternative arrangements without reaching the suspension stage and provides for a less stressful experience for older customers. Verizon has agreed to gather input from Staff and/or OPC on future communications made to mature customers.

5. ***The Migration Appointment:*** On a date convenient for the customer, a technician must visit the customer's property to access Verizon's equipment (e.g., the drop line connecting the premises to Verizon's network) to perform the migration. The technician installs an Optical Network Terminal ("ONT"), which is the point of demarcation between the fiber line in Verizon's network coming to the home and the customer's inside wiring. The ONT may be located inside or outside the home but the technician must connect the ONT to an electrical outlet. The technician also disconnects Verizon's drop wire from the Network Interface Device ("NID"), which was the point of demarcation between the Verizon copper line and the inside wire. The NID also may be located inside or outside the home. Verizon performs the migration at no charge to the customer, and supplies the customer with a battery back-up unit (the PowerReserve) and first set of batteries free of charge. The technician will ensure that any devices using the telephone line (faxes, alarms, medical devices) are up and running on the fiber line while at the visit. The technician also provides written information about the battery back-up to the customer; this information is in addition to information provided at the time the customer places his or her order.
6. ***Suspension:*** Letter 1 provides customers with a deadline by which they must contact Verizon to schedule an appointment for a technician to perform the migration. The letter informs the customer that "if you have not scheduled an appointment to transfer your services, your Verizon services will be suspended on or after" the indicated date. Verizon's goal is to have customers respond and never reach suspension. But experience in other states has shown that some customers do not respond until their service is suspended. Suspension is not a disconnection of the copper dial tone. A customer who is suspended can still place calls to 911 and to the Verizon business office. This point is made in the "frequently asked questions" provided with Letter 1, which state that "[o]nce your service is suspended you will only be able to call 9-1-1 and our customer service number." On the date of suspension, Verizon sends the customer "Letter 2," informing him/her that if he/she does not call Verizon to set up an appointment, service will be disconnected on or after a specific date.
7. ***Disconnection:*** If the customer still has not called to set up an appointment, Verizon will disconnect the customer's copper telephone service approximately 14 days after suspension. That means the customer will receive a final bill and will no longer have calling functionality on his/her line. Verizon has found from its experience in other states that the small subset of customers who reach this stage rarely call back to reestablish Verizon service. However should the customer call and request that Verizon reestablish his/her service, Verizon will install service on a fiber line. The customer's telephone number will be kept available for 3 months from disconnection

(business telephone numbers will be kept available for 12 months).⁴ Therefore, in the unlikely event that a customer was away for an extended period and never saw the previous notices, the customer can still call and restore the same service with the same telephone number, over a fiber line.

8. **Copper Retirement:** On or after the date specified in Verizon's copper retirement notice (in the case of the Maryland wire centers currently at issue, September 15, 2017), Verizon will retire the copper and may remove the copper facilities in the field.

B. Process Changes and Clarifications Agreed to with Staff and OPC:

The parties discussed and clarified several issues relating to the details of migration of residential voice service from copper to fiber facilities under Verizon's network transformation program, as follows:

1. **Filing Copper Retirement Notice with Commission Secretary:** The FCC's rule at 47 C.F.R. § 51.332(b)(4) requires Verizon to "notify and submit a copy" of its copper retirement notice "to the public utility commission . . . of the State in which the network change is proposed." It is staff's position that sending a single copy of the notice to the Chairman of the Commission with no cover letter or explanatory document did not constitute notice and that, as a practical matter, it could result in the notice not being distributed to the Commission as a whole or to Staff. Verizon agreed that it will file⁵ any future copper retirement notices relating to Maryland with the Commission Secretary under the normal filing process. At the request of Staff, Verizon filed the September 15, 2016, FCC Public Notice of Copper Retirement under 47 C.F.R. § 51.332 with Secretary Collins on December 23, 2016 (ML#208257).
2. **Clarifying Communications on When Customer Must Take Action:** One primary concern of Staff and OPC was to avoid customer confusion about the date by which the customer must take action. For example, OPC raised a concern that Verizon had inadvertently confused customers by stating the ultimate copper retirement date of September 15, 2017 in its initial notice of copper retirement sent September 15, 2016. OPC believes that doing so caused some customers to believe they did not have to act until that date. Those customers then subsequently received Letter 1 asking them to contact Verizon to place a migration order by a different, earlier date (December 14, 2016 in the case of the first wave of customers). Verizon agreed to make changes to the initial copper retirement notice letter to address this issue. Because this notice is an FCC requirement, Verizon reviewed the changes with the FCC Staff. A template of the new

⁴ Federal rules preclude Verizon from holding a residential number for more than 3 months or a business number for more than 12 months. See 47 CFR 52.15(f)(1)(ii).

⁵ A filing with the Public Service Commission is accomplished through the sending of an original and 17 copies of the document to be filed with each copy (and the original) accompanied by a descriptive cover letter. The documents must also be filed electronically and served to any relevant service list.

initial notice letter (Letter 0) to be used for any copper retirement filings going forward is attached as Exhibit B.

3. ***Additional Clarifications to Customer Letters:*** The parties also agreed to various changes to Verizon's Letter 1 to improve the clarity of communications and ensure that the letter addresses issues of importance to Staff and OPC. A template of the new Letter 1 to be used going forward is attached as Exhibit C.
4. ***Fiber Voice Service is not "Fios":*** The parties discussed that regulated voice service provided over fiber facilities is not "Fios" service. The migration to fiber is simply a change in the underlying facilities, not a change in the customer's service. "Fios" refers to the packages of voice/television/internet that Verizon offers in certain fiber-served areas. However, the network transformation customers are not required to purchase any other services, and they may retain the same regulated Verizon voice services they received over copper facilities, at the same price, terms, and functionality. Although Verizon offers in the marketplace a "Voice over Internet Protocol" or "VoIP" service marketed as "Fios Digital Voice" or "FDV," Verizon's copper retirement process focuses on migrating customers of regulated time division multiplexing ("TDM") voice services to the same service provided over fiber facilities, not to FDV. The same voice service is provided at the same price, remains regulated by this Commission, and is no different in regulatory status from the service previously provided over copper facilities. Verizon is making clarifying changes to its communications to address this issue (see Exhibit C). The parties also discussed confusion that results from the lack of clarity in discussing the fiber versus Fios distinction in the outbound phone calls from live representatives. Verizon will ensure that its representatives are trained to use the correct terminology and explain the difference if the issue comes up with the customer. Verizon representatives do not currently mention Verizon's unregulated voice product unless asked. Going forward, Verizon agreed to promptly handle OPC's concerns about customer confusion between regulated/unregulated voice on a case by case basis, and to also keep discussions open for further changes to Verizon written and verbal communications should the need arise.
5. ***Communications Regarding Battery Back-Up:*** OPC and Staff expressed concern about how Verizon notifies customers about battery back-up for voice service provided over fiber facilities.⁶ OPC wants to ensure that customers understand that the battery back-up unit powers only voice service, not other devices that might rely on commercial power. The FCC has previously reviewed requirements relating to disclosure of battery back-up,

⁶ Voice service, whether provided over copper or fiber facilities, requires power to operate. In the traditional copper network, service is powered at a provider's central office; copper lines are powered by the commercial power (and battery back-up) serving the central office. Because fiber-optic lines (like cable) do not conduct electricity, they cannot be powered in the same way at the central office; they must be powered at the customer location. The FCC established rules to govern the offering of battery back-up to customers for voice services over non-powered facilities, and Verizon complies with those rules. *See Report and Order, In the Matter of Ensuring Continuity of 911 Communications*, PS Docket 14-174, FCC 15-98, released August 6, 2015 ("Battery Back-up Order").

and Verizon's communications comply with those rules, with detailed information in its initial notice and in subsequent communications. Verizon's "frequently asked questions" attached to its letters tell the customer that "[c]ordless phones, alarm equipment, or other devices that require electricity to operate will not be powered by the backup battery device." OPC also wants to ensure that customers receive more detailed written information about how to operate the battery back-up unit. Verizon assured OPC that it provides a more detailed written instruction document to the customer at the time of installation. Verizon provided a copy of that document to OPC and Staff. Verizon technicians also are instructed to explain the battery back-up unit's operation to the customer at that time. Verizon's residential network transformation customers in Maryland would receive the PowerReserve, recognized by the FCC as an "innovative new solution" that meets the FCC's current and future requirements today.⁷ The PowerReserve uses standard D Cell batteries and offers much longer periods of operation, at least 24 hours on a single set of batteries. Customers can extend the back-up time by turning the unit off when not in use to conserve the battery or replacing with a fresh set of batteries. Practically speaking, this means that a customer can continue to use voice service provided over fiber facilities to make and receive phone calls, even if the power is out for days or weeks, simply by changing the D cell batteries and/or using the conservation methods. Although not required by the FCC rules, Verizon currently provides a PowerReserve unit free of charge to network transformation customers and also provides the first set of batteries for free. Verizon is making clarifying changes to its communications to address this issue.

6. ***Proceeding in Waves and Suspending/Disconnecting Non-responding Customers is Reasonable:*** Following detailed discussions, the parties agreed that it was not practical for Verizon to wait until the last day to migrate all customers in a wire center area from copper to fiber facilities. It is Verizon's position that it is reasonable to request customers to make their appointments well before the end of the overall copper retirement period, so long as notices are clear and provided within the 90 day-period between the initial letter and suspension of service. The parties also agreed that customers will receive no less than 45 days between the issuance of Letter 1, which contains notice of a suspension date, and the suspension date itself, and that any changes to the process would be shared with the parties in advance. Under those terms, it is also reasonable to suspend service to customers who do not respond.

Suspending a customer's service may not mean that Verizon has "disabled or removed" the copper serving that customer at that time. The copper remains in place and the customer still receives "soft dial tone," including the continued ability to call 911. While Verizon must offer telephone service, nothing in Maryland law requires Verizon to offer the service over copper facilities.

⁷ See Battery Back-up Order at ¶ 33.

7. ***Periodic Reporting and Meetings.*** Beginning on or after February 1, 2017, Verizon, Staff and OPC will establish a regular schedule for Verizon to provide specific updates on the ongoing network transformation projects in Maryland. At mutually agreed upon intervals, Verizon will provide the parties with information on progress and data related to the network transformation waves that are in progress. The information will include the number of customers, details of the migration activities (i.e. the number of customers that migrate on “like for like services” or port to other carriers), the results of the migrations, and information on any customer complaints, to enable the parties to monitor the Maryland network transformation activities.

The parties have discussed and agree that there may be modifications to plans, communication, or other aspects of the network transformation projects. Verizon has agreed to use this regular discussion as a means to share any planned modifications with the parties. The parties also agree that these regularly scheduled discussions will allow Staff and OPC an opportunity to share any customer specific issues that may arise.

C. Completing the Current Customer Wave

To provide more time for the parties to discuss these issues, Verizon stopped its network transformation process for the first wave of customers in Maryland before the scheduled December 14, 2016 suspension date. Verizon did not suspend customers during this time and it halted the normal network transformation communications. To inform the customers of this development, on December 17, 2016, Verizon made automated calls to the 1,657 customers who had not placed an order with Verizon and mailed a letter with similar information shortly thereafter. The automated message stated as follows:

This is Verizon with a very important message. Your Verizon service was due to be suspended December 14th. Verizon is rescheduling that date and will be in touch with our Maryland customers with a new schedule to move your line to fiber. If you wish to move forward with transitioning your line to fiber, you may speak with a representative by pressing 1 or you can reach us at 1- 877-439-7442.

Most of the 5,333 residential customers included in the original wave took action. Of the customers that took action, 83% have migrated their service to the fiber platform. The remaining 17% either chose another carrier or chose to place an order with Verizon to disconnect the line. Some customers have continued to call and place orders during the hiatus period. As of this filing, approximately 1,253 residential customers have not taken action and remain candidates for the communication timeline discussed below once the process resumes.

In February of 2017, the parties agree that Verizon shall resume its efforts to migrate the remaining customers in this wave. Customers will receive the following communications (as discussed above, communications cease once the customer calls to make an appointment or to take other action such as porting or disconnecting, so only unresponsive customers would go through the whole chain):

2/9/17	Reintroduction ANA
2/16/17	Letter 1
2/26/17	ANA
3/12-19	Outbound Calling (up to 6 attempts)
3/21/17	Postcard
3/31/17	ANA
4/4/17	Suspension letter
4/4/17	Suspension date
4/18/17	Disconnection date

Depending on the ability of Verizon's vendor's to send Letter 1 by February 16, the schedule may change accordingly. In that event there will still be at least 45 days between Letter 1 and the suspension date.


D. Future Network Transformation Waves

For future customer waves in the current network transformation wire centers (Bethesda, Columbia, Glen Burnie, Rockville and Towson), Verizon will use the revised customer communications agreed by the parties. Verizon will proceed with the same general process of suspending customers who do not respond to the numerous communication attempts and disconnecting any who continue not to respond. Verizon will keep Staff and OPC informed of the number of affected customers. Verizon will reconnect any customer who is ultimately disconnected to new service on a fiber line if they call to request service. As described above, Verizon will save a customer's telephone number for the maximum allotted time permitted by the FCC.

If Verizon plans to retire copper in any other wire centers, it will inform Staff and OPC orally before it files the formal copper retirement notice. Verizon will use the revised form of copper retirement notice and other changes to customer communications agreed to with the parties, except that should Verizon make any changes to these communications, or add additional ones, agrees to notify Staff and OPC.

Please do not hesitate to contact me if you have any questions about this matter.

Respectfully,



Suzan D. Paiva

cc: Juan Alvarado, Director, Telecom Division
Leslie Romine, Staff Counsel
Annette Garofalo, Staff Counsel
Joyce R. Lombardi, Assistant People's Counsel
Vincent Trivelli, Counsel – Communications Workers of America

Exhibit A

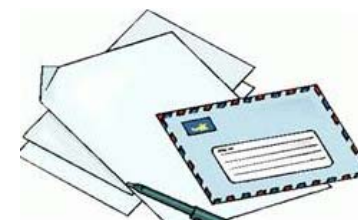
Network Transformation

Communication Intervals
Residence

CMB Communication Intervals –Maryland

Residence	
Day 1	Letter 0
Day 45	Letter 1
Day 53	ANA
Day 65-75	OBC
Day 80	Postcard
Day 85	ANA 2
Day 90	Response Date
Day 91	Letter 2 Suspension
Day 91	Suspension
Day 105	Disconnect

- Letter 0 starts 90 day notification
- Standard Comm plan begins at Letter 1
 - Standard Comm plan is 60+ days
 - Day 1 – Letter 1
 - Day 8 – ANA
 - Day 20-30 – Outbound Calling
 - Day 30 – Postcard
 - Day 40 - ANA 2
 - Day 45 – Response Date
 - Day 46 – Suspend
 - Day 46 – Suspend Letter
 - Day 60 - Disconnect





NOTICE OF COPPER RETIREMENT

Date

Name

Address

Dear John Q. Sample:

Telephone Number:

Currently, Verizon brings voice and/or data services to your home over copper cables. However, the company is upgrading to fiber-optic technology in your area, and will be retiring its copper facilities that currently serve you and your neighbors.

To continue to provide you service, Verizon will have to move your service to these fiber-optic facilities. If fiber is available to your home now, we will be contacting you individually soon to schedule an appointment to transition your services to fiber. Otherwise, we will be contacting you once fiber is available. In either case we will need to move your service well before we retire the copper in your area which is scheduled for on or after (date we say in the filing).

We will transfer your voice services from copper to fiber at no cost to you. This transfer will not result in any change to the voice service that you currently receive from Verizon. You may continue to subscribe to the same voice service at the same price, terms, and conditions. In addition, any devices that rely on your voice service, such as fax machines, medical devices, or security alarms connected to a central station, will continue to work in the same way as they currently do over copper. We will also provide you with a battery backup device at no charge. For almost all residential customers, that device uses standard D-cell batteries that can support up to 24 hours of standby voice service during a commercial power outage. In case of a prolonged power outage, you can simply replace the batteries and extend the backup power.

If you subscribe to our High Speed Internet service, the migration to fiber will require a change since that service is not available on our fiber facilities. The Internet access service that we offer on fiber is Fios Internet. Fios Internet is available at significantly faster speeds than High Speed Internet. We will offer the service at a special rate for customers who migrate from copper to fiber facilities as a result of the retirement of our copper facilities. In some cases, this price may be lower or higher than what you currently pay for Internet access.

Please review the Frequently Asked Questions for additional information about the fiber upgrade or visit us at verizon.com/fiberupgrade. If you still have questions, please call us Monday through Friday, 8 a.m. - 8 p.m. or Saturday 9 a.m. - 5 p.m. at 1.877.439.7442.

You may also contact the Federal Communications Commission or your State Commission if you have any questions.

Thank you for continuing to be a loyal customer. We greatly appreciate your business.

Sincerely,

A handwritten signature in black ink, reading "Janet Gazlay Martin".

Janet Gazlay Martin

Director-Network Transformation
 Verizon
 230 W 36th St.
 NY, NY 10018

On behalf of:

Verizon Delaware LLC 901 Tatnall Street Wilmington, DE 19801	Verizon New Jersey Inc. 540 Broad Street Newark, NJ 07102	Verizon Virginia LLC 22001 Loudoun County Parkway Ashburn, VA 20147
Verizon Maryland LLC 1 East Pratt Street Baltimore, MD 21202	Verizon New York Inc. 140 West Street New York, NY 10007	
Verizon New England Inc. 125 High Street Oliver Tower 7th Floor Boston, MA 02110	Verizon Pennsylvania LLC 1717 Arch Street Philadelphia, PA 19103	

Federal Communications Commission

445 12th Street SW
 Washington, DC 20554
 Phone: (888) 225-5322
<https://consumercomplaints.fcc.gov/hc/en-us>

State Public Utility Commissions

Delaware Public Service Commission Cannon Building, Suite 100 861 Silver Lake Boulevard Dover, DE 19904 (302) 736-7500	New York State Department of Public Service 3 Empire State Plaza Albany, New York 12223-1350 (518) 474-6530
Maryland Public Service Commission William Donald Schaefer Tower 6 St. Paul St., 16th Floor Baltimore, MD 21202 (410) 767-8000	Pennsylvania Public Utility Commission PO Box 3265 Harrisburg, PA 17105-3265 (717) 772-7777
Massachusetts Department of Telecom & Cable 1000 Washington Street Suite 820 Boston, MA 02118-6500 (617) 305-3580	Rhode Island Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888 (401) 941-4500
New Jersey Board of Public Utilities 44 S. Clinton Avenue Trenton, NJ 08625 (800) 624-0241	Virginia State Corporation Commission Public Utilities P.O. Box 1197 Richmond, Virginia 23218 (804) 371-9420

If you have questions about this notice, please reference the applicable Copper Retirement ID Number(s) for your state(s) in your inquiry:

Service Address State	Copper Retirement ID Number
DE	2016-03-A-DE
MA	2016-03-A-MA
MD	2016-03-A-MD
NJ	2016-03-A-NJ

NY	2016-03-A-NY
PA	2016-03-A-PA
RI	2016-03-A-RI
VA	2016-03-A-VA

Frequently Asked Questions

- 1. Why fiber-optics?** Fiber-optic facilities provide bandwidth to meet today's digital demands and the possibilities of tomorrow. And the quality, performance, and reliability that fiber-optics delivers for voice and other services are far superior to copper.
- 2. I don't want fiber-optics. What are my alternatives?** After we retire copper facilities in your area, we will only provide service over fiber-optics. So in order to continue receiving Verizon services, you will have to migrate to our fiber facilities.
- 3. How can I schedule an appointment?** Verizon will contact you to schedule an appointment that is convenient for you. You may also call us at 1.877.439.7442 if you have any questions.
- 4. Is the installation process complicated? What equipment is needed in order for me to upgrade to the fiber-optic facilities?** Our goal is to make this as easy as possible. We will provide and install all the required equipment, and use the existing wiring at your home to connect to your phones. We will also provide a backup battery for voice service (see Question #6). Our technician will answer any questions you have and ensure everything is working properly before he or she leaves.
- 5. Will my service or rates change as a result of the fiber upgrade?** Your existing voice service will not change, aside from the added benefit of being delivered over our better quality fiber-optic facilities. High Speed Internet is not available on fiber, but you may choose to have Fios Internet instead. If you choose to purchase Fios Internet, you will be billed accordingly for the service you select.
- 6. What is the backup battery?** We will provide you with a backup battery device at no charge that will power your voice service in the event of a power outage, allowing you to make and receive calls, including to 911, on your corded telephones. For almost all residential customers, we can provide a battery backup device that can provide standby service for up to 24 hours using standard D-cell batteries. In the event of a prolonged power outage, you can simply replace the D-cell batteries for additional backup power. (Cordless phones, alarm equipment, or other devices that require electricity to operate will not be powered by the backup battery device.)
- 7. What if I change providers?** Providers using Verizon's copper facilities have been notified regarding the copper-to-fiber transition and will also be required to migrate to Verizon's fiber-optic facilities. You may transfer (or "port") your number to a new provider.



AVISO DE RETIRADA DEL COBRE

Fecha

Nombre
Dirección

Estimado(a) John Q. Sample:

Número de teléfono:

En la actualidad, Verizon le presta los servicios de voz o datos que llegan a su hogar a través de cables de cobre. No obstante, la compañía está instalando tecnología de fibra-óptica en su zona y esto significa que se retirarán las instalaciones de cobre que les sirven a usted y a sus vecinos.

Para poder continuar prestándole sus servicios, Verizon tendrá que trasladarlos a las nuevas instalaciones de fibra-óptica. Si ya está disponible la fibra para su residencia, pronto nos pondremos en contacto con usted personalmente para hacer una cita con el fin de instalarle el servicio de fibra. De lo contrario, nos comunicaremos con usted cuando esté disponible. En cualquier caso necesitaremos trasladar el servicio con bastante antelación a la fecha en que se retire el cobre de su zona, que será el día (date we say in the filing) o después de esa fecha.

La transferencia de los servicios de voz de cobre a fibra será gratuita. Esta transferencia no cambiará de ningún modo el servicio de voz que usted recibe de Verizon. Podrá seguir suscrito el mismo servicio de voz al mismo precio y con los mismos términos y condiciones. Además, los dispositivos que dependan del servicio de voz, como pueden ser máquinas de fax, dispositivos médicos o alarmas de seguridad conectadas a una estación central, seguirán funcionando como lo han hecho hasta ahora con las instalaciones de cobre. También le facilitaremos gratis un dispositivo que funcionará como batería de reserva. Para la mayoría de los clientes residenciales, estos dispositivos emplean pilas D-cell, capaces de proporcionar 24 horas de energía al servicio de voz en espera cuando se produce un corte de electricidad. Si el corte dura más de ese tiempo, solo tiene que cambiar las pilas para prolongar la disponibilidad.

Si se suscribe a nuestro servicio de Internet de Alta Velocidad, sí habrá un cambio, ya que dicho servicio no se ofrece en las instalaciones de fibra. En su lugar el acceso a Internet se ofrece a través del servicio Internet de Fios. Internet de Fios está disponible a velocidades muy superiores a las que alcanza el Internet de Alta Velocidad. Este servicio estará disponible a un precio especial para los clientes que migren de cobre a fibra como resultado de la retirada de las instalaciones de cobre. En algunos casos, el precio puede ser inferior o superior al que paga ahora por el acceso a Internet.

En la sección de preguntas más frecuentes encontrará más información sobre la actualización con fibra o también puede visitar verizon.com/fiberupgrade. Si sigue teniendo alguna duda, llámenos de lunes a viernes de 8 a.m. a 8 p.m. o los sábados de 9 a.m. a 5 p.m. al 1.877.439.7442.

También puede ponerse en contacto con la Comisión Federal de Comunicaciones o la comisión de su estado si tiene alguna pregunta.

Permítame agradecerle su lealtad como cliente y su confianza.

Atentamente,

A handwritten signature in black ink that reads "Janet Gazlay Martin".

Janet Gazlay Martin
Directora, Network Transformation
Verizon
230 W 36th St. Rm 802
NY, NY 10018

En nombre de:

Verizon Delaware LLC 901 Tatnall Street Wilmington, DE 19801	Verizon New Jersey Inc. 540 Broad Street Newark, NJ 07102	Verizon Virginia LLC 22001 Loudoun County Parkway Ashburn, VA 20147
Verizon Maryland LLC 1 East Pratt Street Baltimore, MD 21202	Verizon New York Inc. 140 West Street New York, NY 10007	
Verizon New England Inc. 125 High Street Oliver Tower 7th Floor Boston, MA 02110	Verizon Pennsylvania LLC 1717 Arch Street Philadelphia, PA 19103	

Federal Communications Commission

445 12th Street SW
Washington, DC 20554
Teléfono: (888) 225-5322
<https://consumercomplaints.fcc.gov/hc/en-us>

Comisiones de servicios públicos estatales

Delaware Public Service Commission Cannon Building, Suite 100 861 Silver Lake Boulevard Dover, DE 19904 (302) 736-7500	New York State Department of Public Service 3 Empire State Plaza Albany, New York 12223-1350 (518) 474-6530
Maryland Public Service Commission William Donald Schaefer Tower 6 St. Paul St., 16th Floor Baltimore, MD 21202 (410) 767-8000	Pennsylvania Public Utility Commission PO Box 3265 Harrisburg, PA 17105-3265 (717) 772-7777
Massachusetts Department of Telecom & Cable 1000 Washington Street Suite 820 Boston, MA 02118-6500 (617) 305-3580	Rhode Island Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888 (401) 941-4500
New Jersey Board of Public Utilities 44 S. Clinton Avenue Trenton, NJ 08625 (800) 624-0241	Virginia State Corporation Commission Public Utilities P.O. Box 1197 Richmond, Virginia 23218 (804) 371-9420

Si tiene alguna pregunta acerca de este aviso, haga referencia al número(s) de ID de retirada del cobre para su(s) estado(s) cuando haga su consulta:

Service Address State	Copper Retirement ID Number
DE	2016-03-A-DE
MA	2016-03-A-MA
MD	2016-03-A-MD
NJ	2016-03-A-NJ
NY	2016-03-A-NY
PA	2016-03-A-PA
RI	2016-03-A-RI
VA	2016-03-A-VA

Preguntas más frecuentes

1. **¿Por qué la fibra-óptica?** Las instalaciones de fibra-óptica ofrecen el ancho de banda necesario para responder a las exigencias digitales de hoy y a las posibilidades de mañana. Además, la calidad, rendimiento y confiabilidad que la fibra-óptica ofrece para servicios de voz y de otro tipo son muy superiores al cobre.
2. **No quiero fibra-óptica. ¿Qué otras alternativas hay?** Una vez retiremos las instalaciones de cobre de su área, solo prestaremos servicio a través de fibra óptica. Por este motivo, si desea seguir recibiendo los servicios de Verizon, deberá migrar a nuestras instalaciones de fibra.
3. **¿Cómo hago la cita?** Verizon se comunicará con usted para hacer una cita en la fecha que le resulte más conveniente. Si lo prefiere, puede llamarnos al teléfono 1.877.439.7442 si tiene alguna pregunta.
4. **¿Es complicado el proceso de instalación? ¿Qué equipo necesito para usar las instalaciones de fibra-óptica?** Nuestra intención es que este proceso sea lo más sencillo posible. Nosotros le facilitaremos e instalaremos todo el equipo necesario y utilizaremos los cables que ya tiene instalados en su hogar para conectar los teléfonos. También le entregaremos una batería de reserva para el servicio de voz (ver la pregunta 6). Nuestro técnico contestará a sus preguntas y se asegurará de que todo funcione debidamente antes de irse.
5. **¿Cambiará el servicio o los precios debido a la actualización con fibra?** El servicio de voz que tiene ahora no cambiará, excepto que le llegará a través de las instalaciones de fibra-óptica que son de calidad superior. El servicio de Internet de Alta Velocidad no se ofrece en las instalaciones de fibra, pero en su lugar puede suscribirse a Internet de Fios. Si decide hacerlo, se le facturará el servicio que elija.
6. **¿Qué es la batería de reserva?** Le facilitaremos de forma gratuita una batería de reserva que suministrará energía a su servicio de voz en caso de que haya un corte de electricidad, para que pueda hacer y recibir llamadas, incluido al 911, desde teléfonos fijos con cable. Para la mayoría de los clientes residenciales, estos dispositivos emplean pilas D-cell, capaces de proporcionar 24 horas de energía al servicio de voz en espera. Si el corte dura más de ese tiempo, solo tiene que cambiar las pilas para prolongar el suministro de reserva. Los teléfonos inalámbricos, los equipos de alarma y cualquier otro dispositivo que necesite electricidad para funcionar no recibirán la alimentación de la batería de reserva.
7. **¿Qué ocurre si cambio de proveedor?** Ya hemos notificado a los proveedores que utilizan las instalaciones de cobre de Verizon sobre la transición de cobre a fibra y también ellos tendrán que migrar a las instalaciones de fibra-óptica de Verizon. Si lo desea puede transferir ("port") su número a otro proveedor.



ACTION REQUIRED - NOTICE OF VERIZON NETWORK UPDATE

DATE

Name
Address

Dear John Q. Sample:

Telephone Number:

We're excited to let you know that we're updating our facilities in your area and that your Verizon services will need to be moved to our newer, more reliable fiber-optic facilities. This move will be done at no cost to you and will provide access to the voice service you enjoy today at the same price and terms. Our goal is to make this transition as easy as possible for you.

It's important that you contact us by **XXXX DATE** to schedule an appointment to have one of our expert technicians come to your residence and move your services. Our technician will ensure that all of your services are moved correctly and will address any questions you have while onsite. Once our facilities are updated to fiber, we will no longer provide any service (including voice or Internet) over our copper facilities in your area. This means that if you have not scheduled an appointment to transfer your services, your Verizon services will be suspended on or after **[insert date]**.

Getting started is simple -- just give us a call at **1.877.439.7442** as soon as possible, and we'll schedule an appointment for you. We are available Monday-Friday (8:00 am-8:00 pm) and Saturday (9:00-5:00 pm).

Please review the attached Frequently Asked Questions for additional information about battery backup for a fiber voice line and other important information on this update. If you still have questions, please call us at **1.877.439.7442** or visit our website, **www.verizon.com/fiberupgrade**.

If you have already placed an order to migrate or disconnect your service, thank you and please disregard this notice.

Thank you for continuing to be a loyal customer. We greatly appreciate your business.

Sincerely,

A handwritten signature in black ink that reads "Janet Gazlay Martin".

Janet Gazlay Martin
Director - Network Transformation
Verizon
230 West 36 St., Room 802
New York, NY 10018

MEDICAL EMERGENCY NOTICE: If someone living in your home has an emergency illness, we will not turn off your telephone service for up to 30 days if you do two things: (1) have a medical doctor inform us in writing of the existence of the emergency, its nature and probable duration and that termination of the service will aggravate the medical emergency; and (2) make acceptable arrangements for Verizon to transition your service to a fiber-optic line. Please see the attached Frequently Asked Questions for more information, including how to send a medical certification.

Frequently Asked Questions On Copper to Fiber Update

Exhibit 3

- 1. What is the new network?** Verizon will be installing our advanced all-fiber optic facilities in your home.
- 2. Why fiber optics?** Verizon's new fiber optic network will enable us to provide you with higher quality service over a more reliable and resilient technology.
- 3. I don't want Fios. What are my alternatives?** This is not Fios voice service. It is your existing voice service, only provided over fiber-optic lines instead of copper lines, at the same price, terms, and conditions. If you currently subscribe to basic regulated voice service provided to you over copper facilities, you will continue to receive that same voice service over the new fiber facilities. You are not required to purchase any of our other services, but if you wish to purchase Internet service please see FAQ 5 regarding options for Fios Internet. See FAQ 11 regarding commercial power and battery backup for your voice service.
- 4. What if I have a fax, alarm, medical monitoring device or other equipment using my voice line?** Any devices that rely on your current voice service, such as facsimile, security alarms connected to a central station, or medical monitoring equipment, will continue to work in the same way as they did over copper.
- 5. Will my rates change after I update to fiber?** If you move your existing voice services to fiber and do not choose to subscribe to any Fios services, you will not see any changes to your bill for your existing voice service. For High Speed Internet customers, the product you currently have is not available on fiber, but Verizon can provide you with a Fios Internet product that is significantly faster at a special rate. Call Verizon to discuss your Internet options. In some cases, this price may be lower or higher than what you currently pay.
- 6. What happens if I do not schedule an appointment?** Your Verizon service will be suspended on or after **XXX DATE** if you do not call before that date to schedule an appointment. The service appointment does not have to take place before that date, but you must call us before that date to schedule the appointment. This appointment is needed to allow Verizon reasonable access to your premises to install, maintain, or replace equipment and facilities that will enable us to move your service to our fiber-optic facilities. If your service is suspended, you will only be able to call 9-1-1 and our customer service number, which is 1.800.VERIZON (1.800.837.4966). Approximately 14 days after being suspended, Verizon service at your address will be disconnected unless you place an order with us to move your service to our fiber-optic facilities.
- 7. What equipment is needed in order for me to update to fiber?** We will extend our fiber optic facilities to your home, and our technician will install an Optical Network Terminal (ONT) for voice service at your home. The placement of this equipment will vary depending on the type of home you live in. We should be able to use the existing wiring in your home, and you will be able to use your existing telephones. We will still need to access your home even if you live in a multi-unit dwelling.
- 8. What is the installation process?** We will work with you to schedule a convenient installation date. On the day of installation, our technician will install the equipment and ensure that your voice service is working properly with your equipment. If you choose to subscribe to new services available on fiber optics, such as Fios, Digital Voice, Fios Internet or Fios TV, the technician will provide professional installation of those services as well. The technician will address any questions at the time of installation.
- 9. What do I need to do?** You will need to schedule an installation appointment at a time when someone 18 years or older will be home. You will also need to provide access to a grounded electrical outlet, which is required to power the ONT.
- 10. Will I be charged for the fiber installation or the new equipment?** There is no charge for the fiber optic extension to your home. There is also no charge for any necessary equipment to migrate your Verizon telephone service. However, if you are migrating from High Speed Internet, or if you purchase services such as Fios TV, you may be charged for the equipment for these services depending on which you select.

11. What is the battery backup? The battery power unit is designed to provide you with backup power for your voice service in the event of a power outage. In such an event, without the backup power unit, telephones in your home will not function, you will not have voice service, and, if you have an alarm system, it may not be able to dial out to a central monitoring station. The backup power unit will allow you to make telephone calls on a corded telephone handset, but it will not power cordless telephones, alarm system equipment, or other devices or equipment that require power. To power those devices during a commercial power outage, you will need an alternative power source such as a generator or uninterruptible power supply. More information on the battery backup will be provided with the unit at the time of installation and can be found at www.verizon.com.

12. What about 911? There will be no changes to the 911 emergency service as a result of upgrading to the new fiber optic network. In the event of an extended power outage that fully depletes battery power in the backup power unit, please put in new batteries in order to place telephone calls, including 911 calls, from a corded telephone handset. Or you will need to use an alternative, such as a cell phone, to dial 911.

13. What other Verizon services are available on fiber optics? In most cases, Verizon Fios Internet and Fios TV are also available on our fiber optic facilities. Fios digital voice service, Fios Internet, and Fios TV are not regulated by the Maryland Public Service Commission.

14. What if there is a medical emergency in my home? If you or anyone presently and normally living in your home is seriously ill, we will not suspend your telephone service for up to 30 days from the date you contact us, provided you: (a) have a physician certify by phone or in writing that such an illness exists and that the person will be endangered if your telephone service is stopped; and (b) contact us at 1.877.439.7442 to place an order by [xxx date](#) to transfer your voice service to fiber. To submit a medical certification [\[insert number to call\]](#)

15. I received a letter saying that copper was being retired in September 2017[or insert other date for future filings]. Why do I have to make an appointment now? Verizon's planned network changes are occurring on a rolling basis. We are planning transitions for your area over the next several months. We need to complete the migration of all services in your area well before the September 2017 copper retirement date.